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April 23, 1998

Magalie Roman Salas, Esq., Secretary
Federal Communications Commission
1919 M Street, NW Room 200
Washington, DC 20554

FCC MAIL ROOM

RE: *Clarification of the Commission's Rules on Interconnection Between LECs and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")

Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, First Report & Order, CC Docket Nos. 96-98, 95-185 ("interconnection reconsideration order")

Formal Complaints of AirTouch Paging against GTE, File Nos. E-98-08, E-98-10

Formal Complaint of Metrocall against Various LECs, File Nos. E-98-14-18

In Re Federal-State Joint Board on Universal Service (CC Docket No. 96-45)

In Re Changes to the Board of Directors of the National Exchange Carrier Association, Inc. (CC Docket No. 97-21)

In Re FCC Form 457, Universal Service Worksheet, Extension of a Currently Approved Collection Under the Paperwork Reduction Act of 1995, OMB Control No. 3060-0768, 62 Fed. Reg. 44966

Dear Ms. Salas:

On April 22, 1998, the Personal Communications Industry Association ("PCIA") conducted a tutorial session on the paging industry. The session began at 10:00 a.m. and ended at 12:00 p.m. and was held in the Commission meeting room (room number 856). Although the presentation was educational in nature, the topics covered included some issues related to the above-referenced proceedings.

Attached are the following: (1) presentation materials: (i) An Overview of the U.S. Paging Industry,

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(ii) Regulation of Paging - An Historical Perspective, (iii) The Paging Network, and (iv) State and Federal Regulation of Paging Carriers: A Side-by-Side Evolution; and (2) a listing of those persons in attendance.

Pursuant to §1.1206(b) of the Commission's rules, two copies of this letter for each referenced docket are hereby filed with the Secretary's office. Kindly refer questions in connection with this matter to me at 703-739-0300.

Respectfully submitted,

A handwritten signature in cursive script, reading "Angela E. Giancarlo". The signature is written in black ink and is positioned above the printed name and title.

Angela E. Giancarlo, Esq.

Government Relations Manager

Attachments

Overview of the US Paging Industry

By

Elliott Hamilton

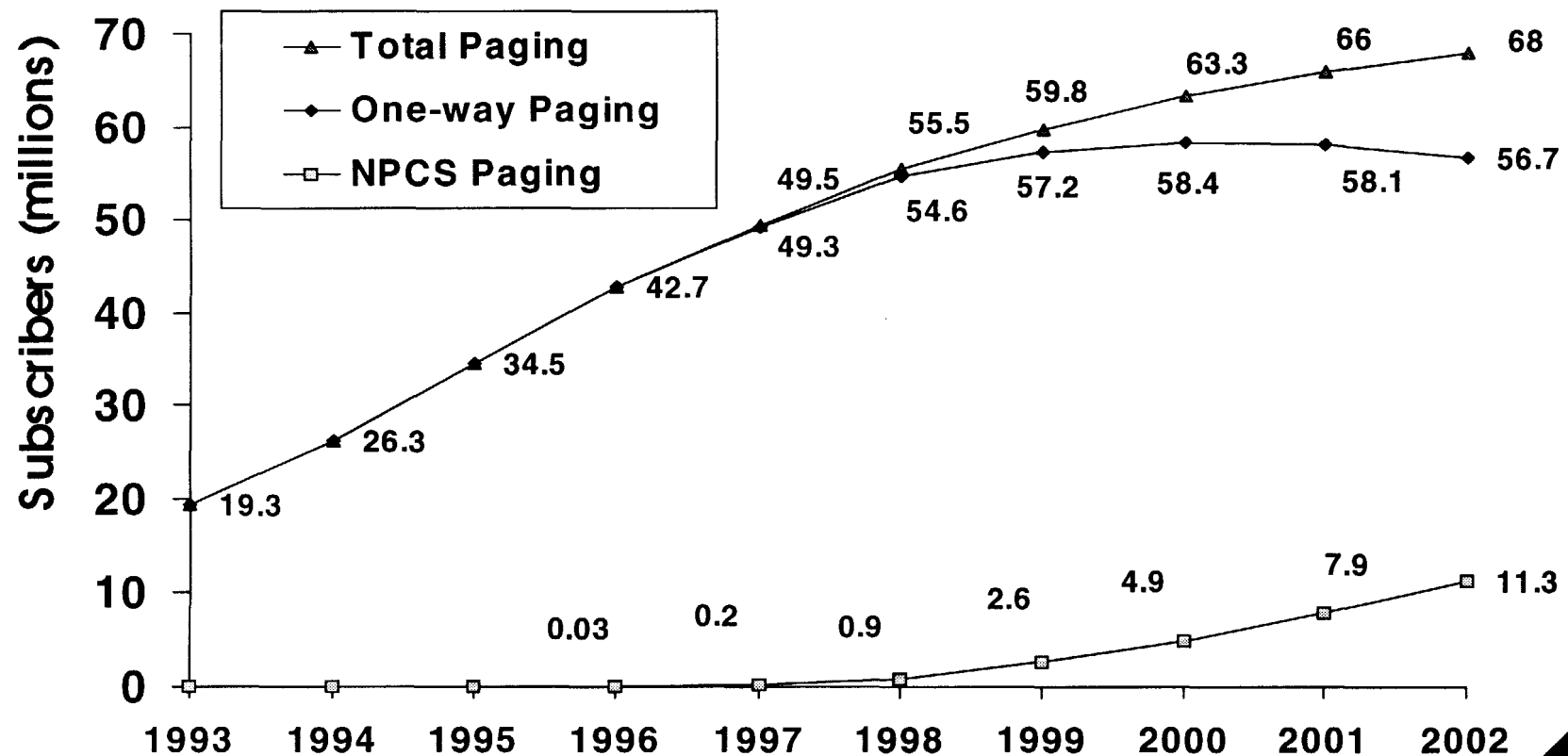
Director of North American Telecom

The Strategis Group
1130 Connecticut Avenue
Suite 325
Washington, DC 20036
phone: 202-530-7500



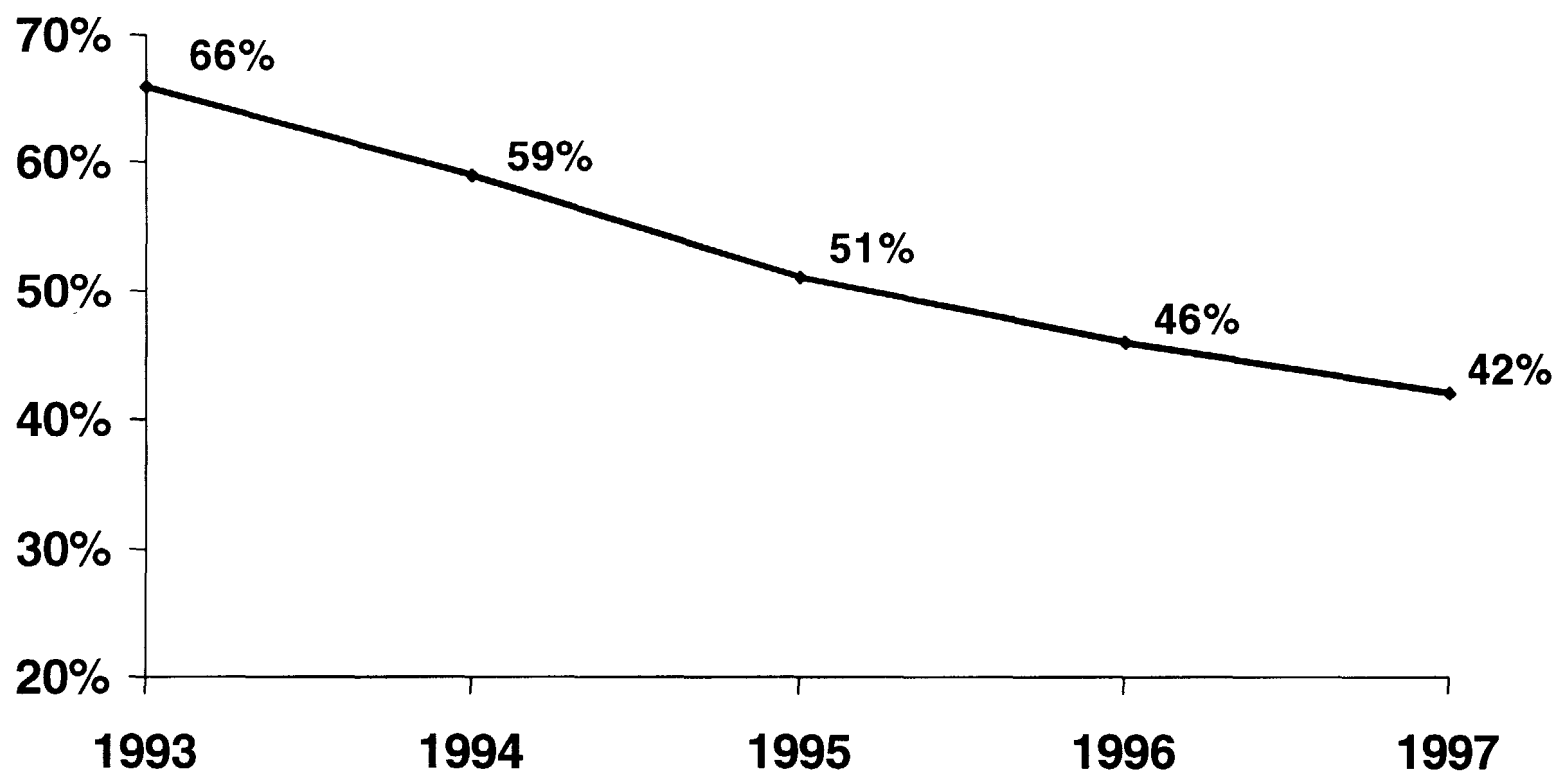
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Paging Subscriber Growth



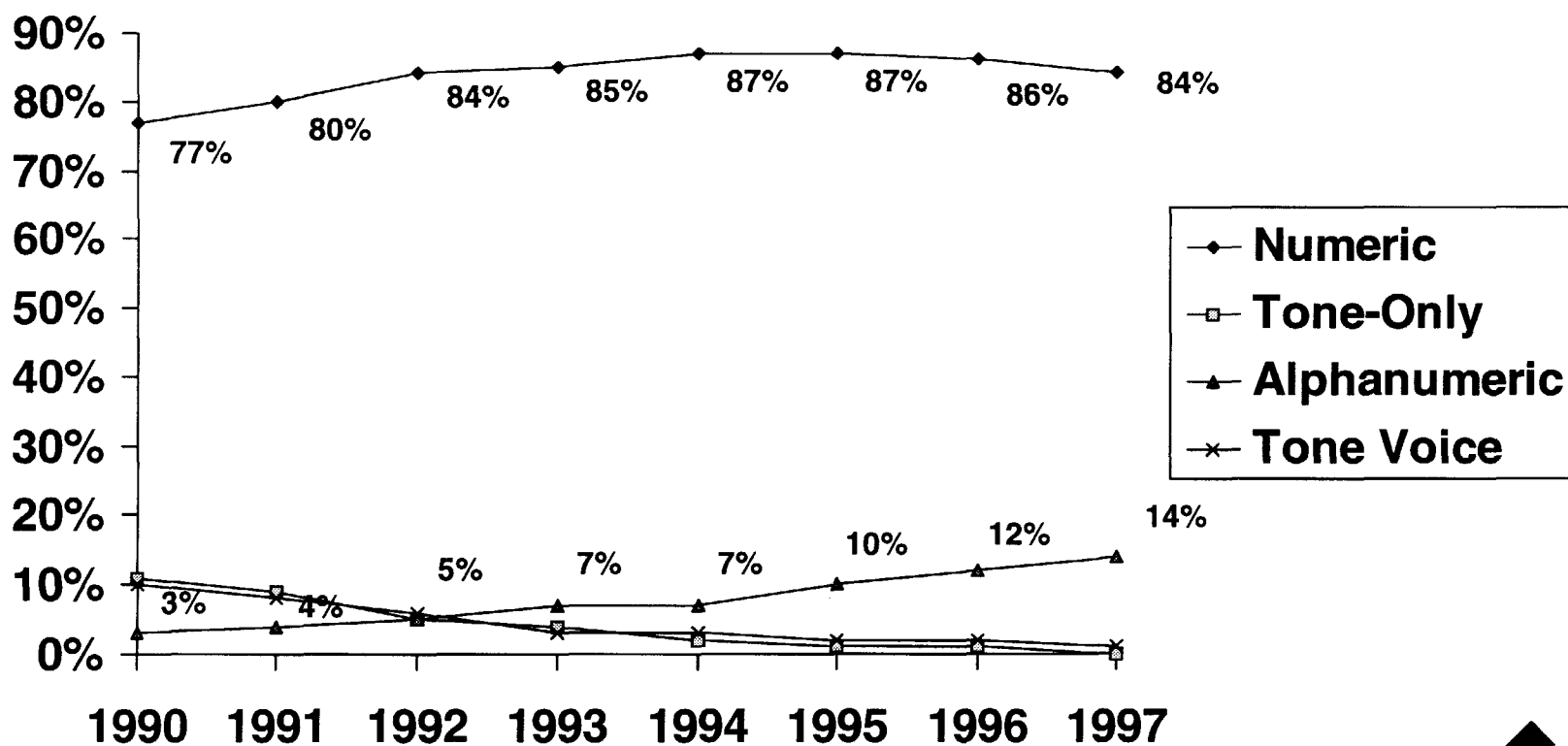
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Business Use of Pagers



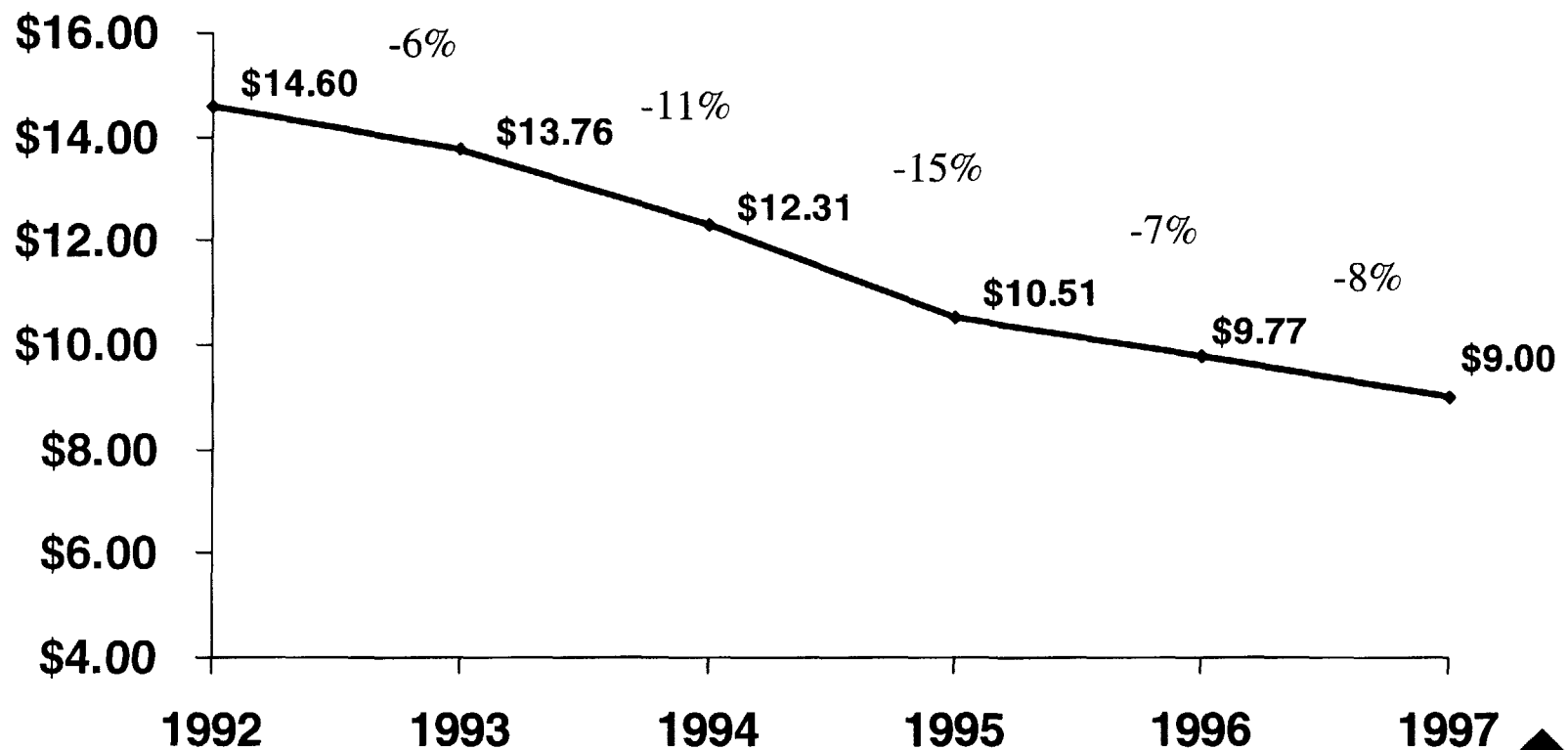
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Percentage of Pagers in Service by Type



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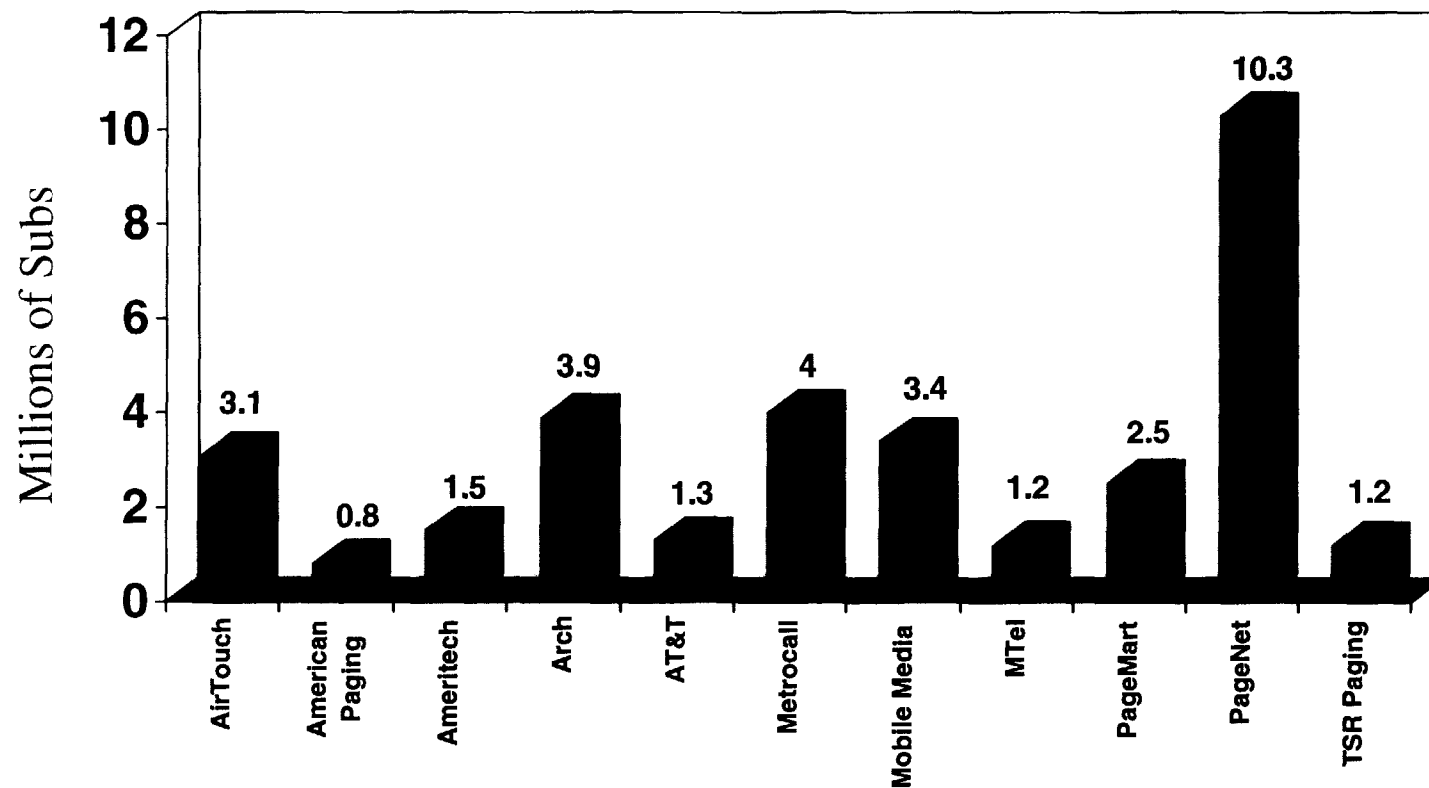
Average Monthly Revenue Per Subscriber



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Major Paging Operators

Year End 1997 Subs



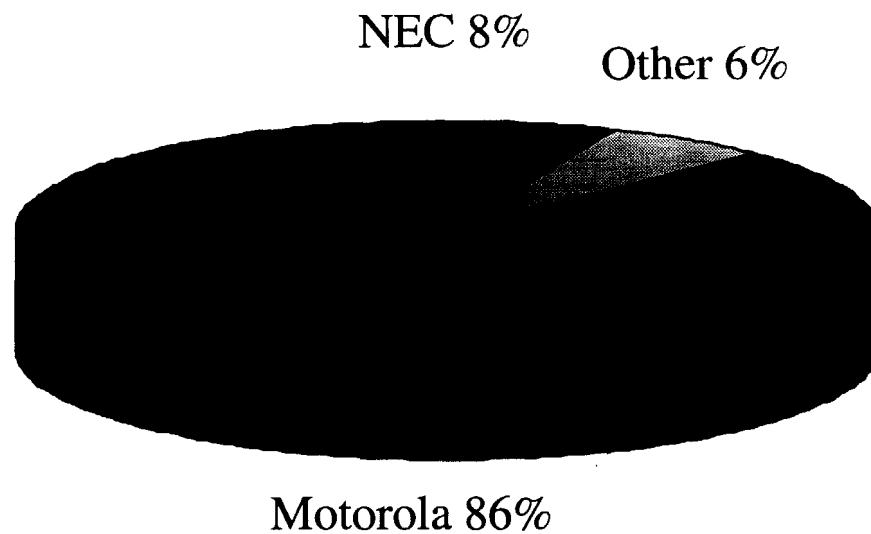
Note: American Paging and TSR Paging merged in 1998 to create TSR Wireless



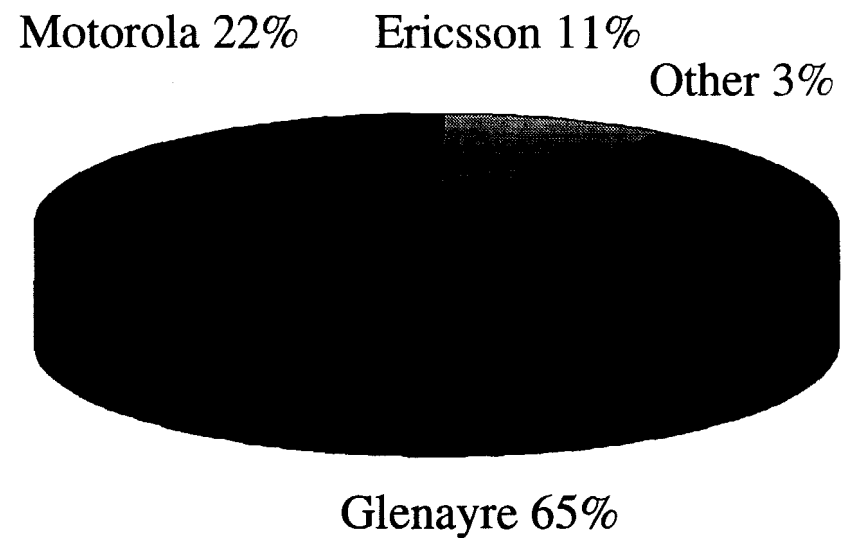
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Market Share by Manufacturer

Pagers



Infrastructure



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REGULATION OF PAGING- AN HISTORICAL PERSPECTIVE

Carl W. Northrop, Esq.



Overview - Paging Is A Regulatory Success Story

- The paging industry has evolved in a relatively short period of time from a highly-regulated duopoly service provided in State-defined franchise areas to a highly competitive service that operates without regard to State boundaries
- Legislative and regulatory actions have played a major role in this metamorphosis.
- It is important to understand the forces that drove this evolution in order to put the current issues facing the paging industry and the Commission into their proper perspective.



The Old Regime

- Paging frequencies were a scarce commodity.
- Separate paging frequencies were set aside for use by wireline and non-wireline carriers (principally to allow fledgling non-wireline competitors to avoid having to vie against incumbent LECs).
- Restrictions were placed on the use of two-way channels for paging.
- An applicant had to apply for and receive a State Certificate of Public Convenience and Necessity before filing an FCC paging application.
- Extensive public need showings and financial qualifications showings were required (leading to numerous protests against new entrants).
- Paging companies had to maintain state tariffs (governing intrastate services) and federal tariffs (governing interstate services).



The Emergence of Competition

- A significant number of new paging channels were allocated.
- The wireline fence was eliminated.
- Prior state certification requirement relaxed, then eliminated.
- Restrictions on the use of two-way channels for paging were lifted.
- Public need showings and financial qualification requirements were relaxed.
- Permissive detariffing of paging services took place at the federal level.
- Many states started to deregulate radio common carrier services.
- Interconnection rights of paging companies were promoted.



Paging Is Offered In A Variety Of Frequency Bands

- Lowband - 32 paging-only channels (35 MHz; 43 MHz)
- Guardband - 4 paging-only channels (152 MHz; 158 MHz)
- VHF/UHF - 18 paired VHF (150 MHz) and 26 paired UHF (450 MHz) for one-way and two way use.
- 929 MHz - 35 paging only channels (Part 90).



Paging Is Offered In A Variety Of Frequency Bands (cont.)

- 931 MHz - 26 paging-only channels (Part 22); 3 nationwide channels
- Narrowband PCS - Eleven nationwide channels (five 50 kHz - 50 kHz paired; three 50 kHz - 12.5 kHz paired, three 50 kHz unpaired); six regional channels (two 50 kHz - 50 kHz paired; four 50 kHz - 12.5 kHz paired); nine local frequencies (two 50 kHz - 50 kHz paired; five 50 kHz - 12.5 kHz paired; two 50 kHz unpaired)
- Other Bands - Flexible usage rules generally allowed paging to be offered in cellular, PCS, FM subcarrier and other bands.



The Early Interconnection Rulings

- 1968 — The "Guardband Order" -- The FCC required LECs to make interconnection available to paging carriers on the same terms and conditions that were available to their own paging systems.
- 1977 — The First Model Interconnection Agreement -- The FCC embraced a Memorandum of Understanding ("MOU") in which LECs agreed to treat radio common carrier paging companies co-carriers rather than end users, to provide necessary interconnection upon request, to provide telephone numbers, and to reduce charges for interconnection and telephone numbers.
- 1980 — Second MOU -- The LECs agreed to reduce their prices for telephone numbers and to offer a single number access plan ("SNAP").
- 1987 — LEC/RCC Interconnection Order -- The FCC interconnection policies established to govern LEC-cellular arrangements were extended to paging interconnection.



Key Statutory Changes

- 1993 — Omnibus Budget Reconciliation Act of 1993 -- Congress amended Section 332 of the Communications Act, providing the FCC with an explicit grant of jurisdiction over LEC-CMRS interconnection. Section 332 also preempted state regulation of CMRS rates and entry and provided regulatory parity for all commercial mobile radio services.
- 1996 — Telecommunications Act of 1996 -- Congress enacted Section 251(b)(5) of the Act, requiring reciprocal compensation for all telecommunications carriers, and Section 251(e), providing the FCC with exclusive jurisdiction over those portions of the North American Numbering Plan pertaining to the U.S.

THE PAGING NETWORK

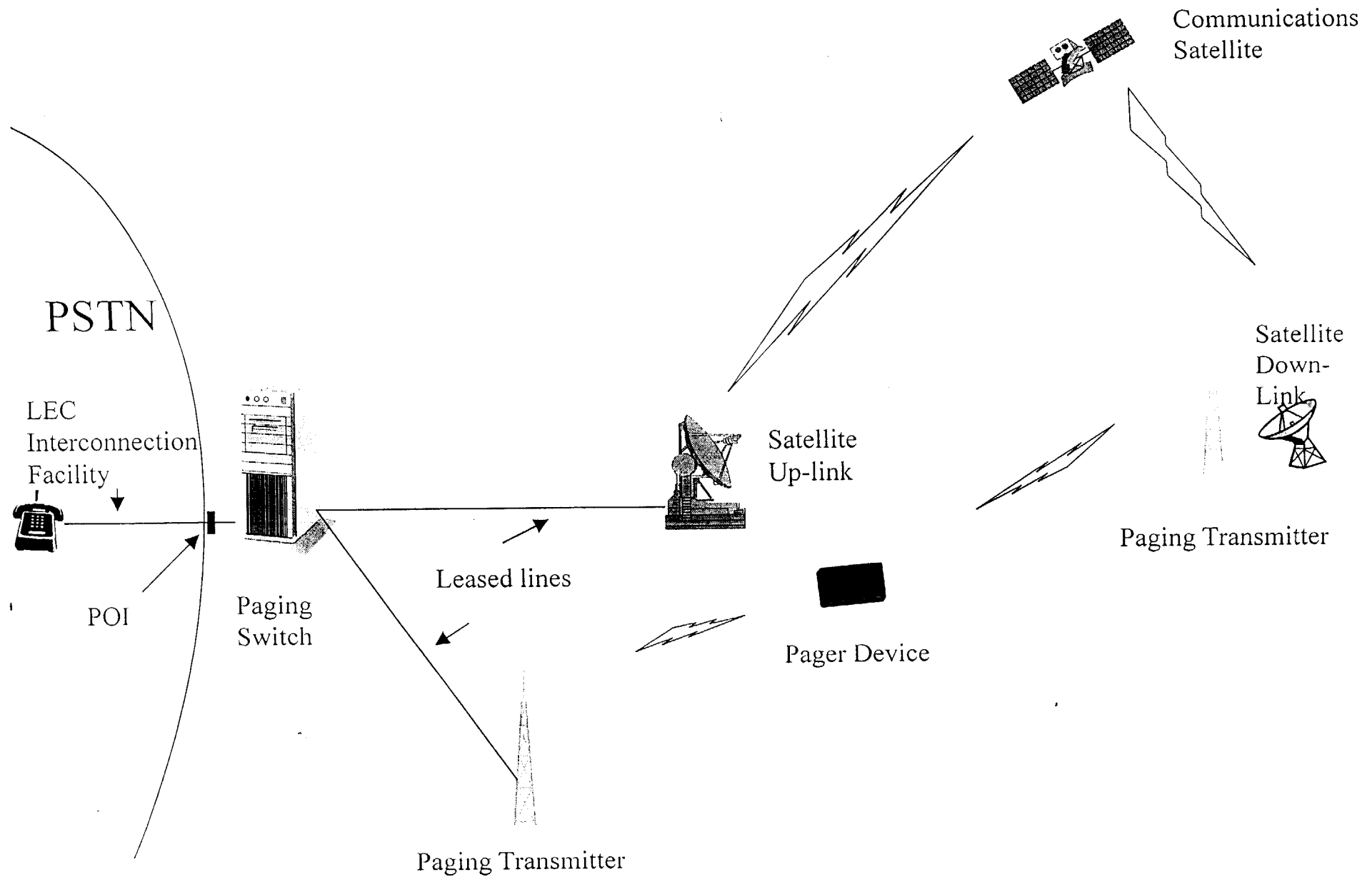
PCIA

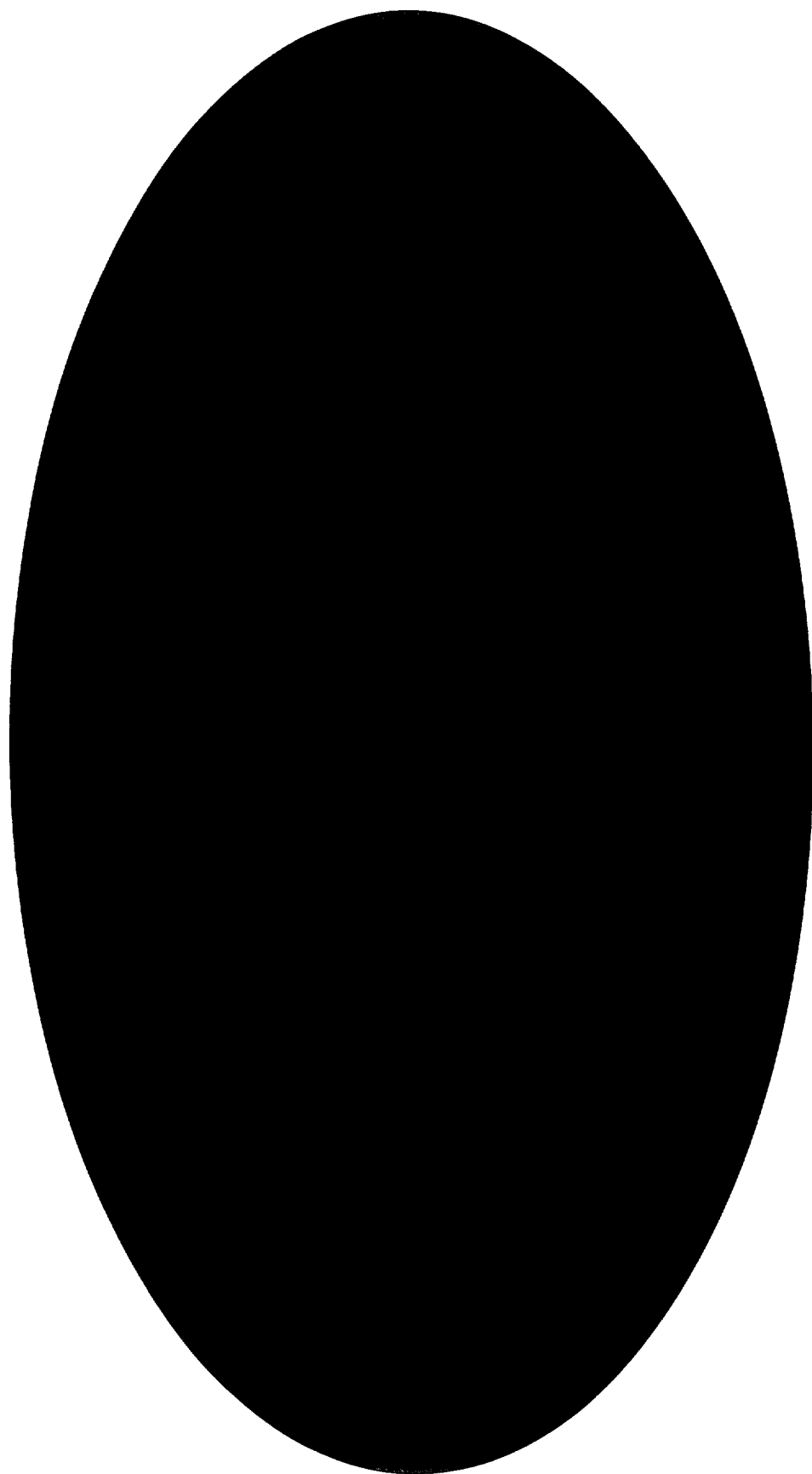
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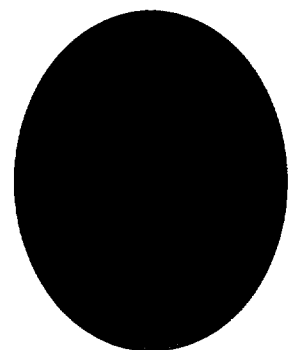
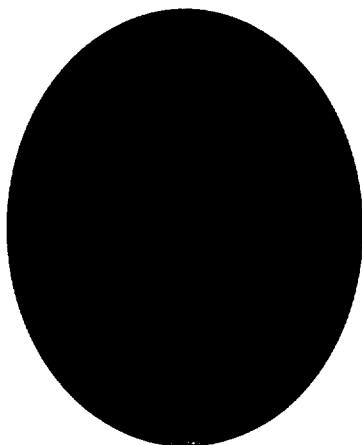
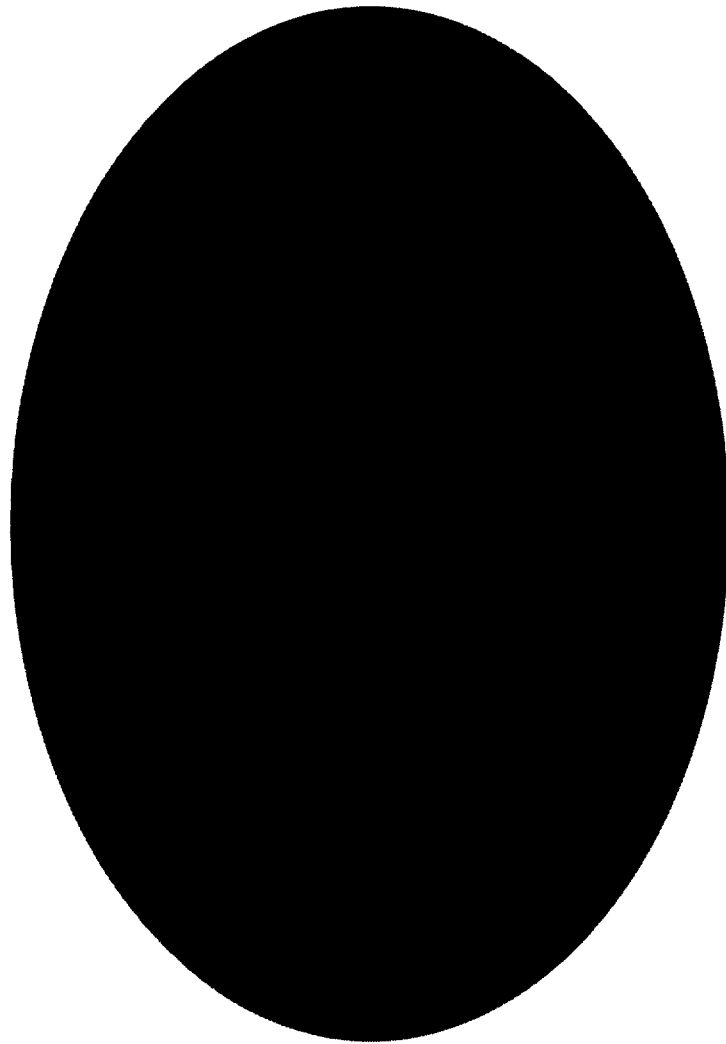
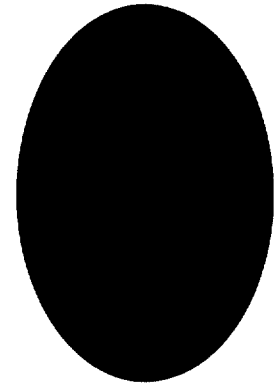
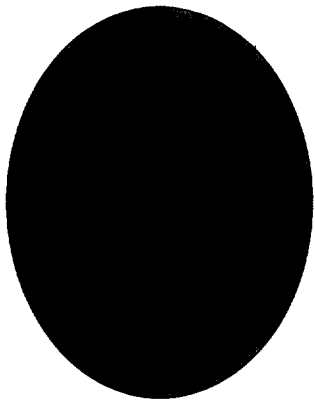
Arch Communications

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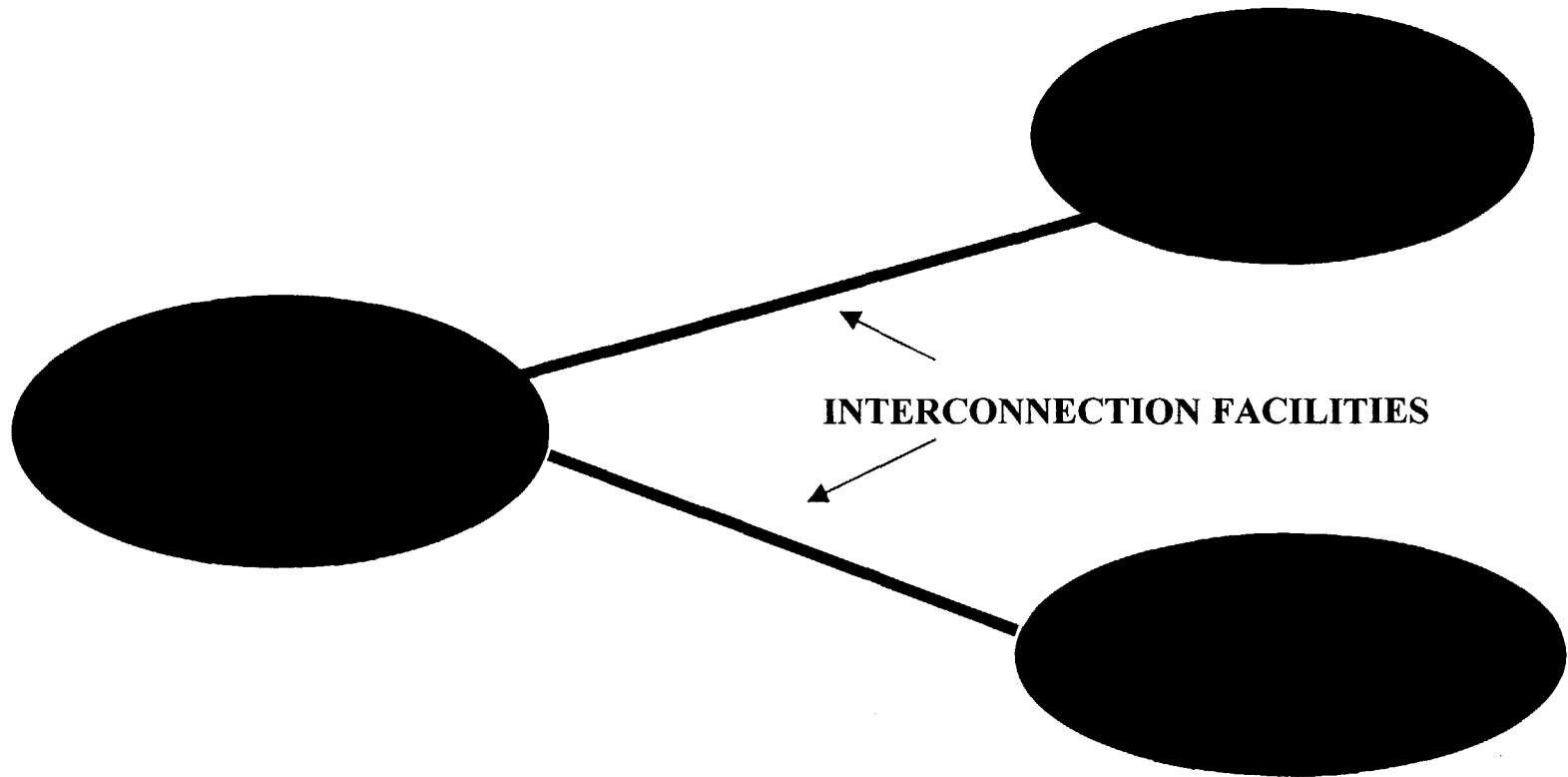
CMRS (Paging Carrier's Network)





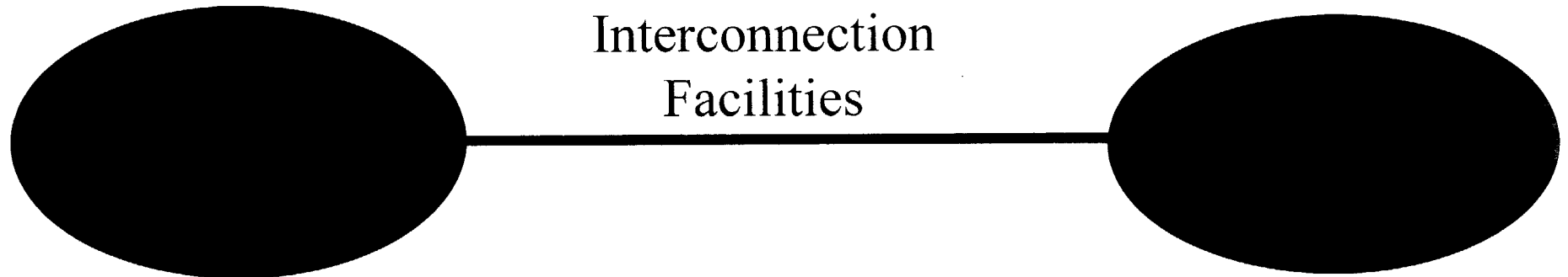


LEC/CMRS INTERCONNECTION



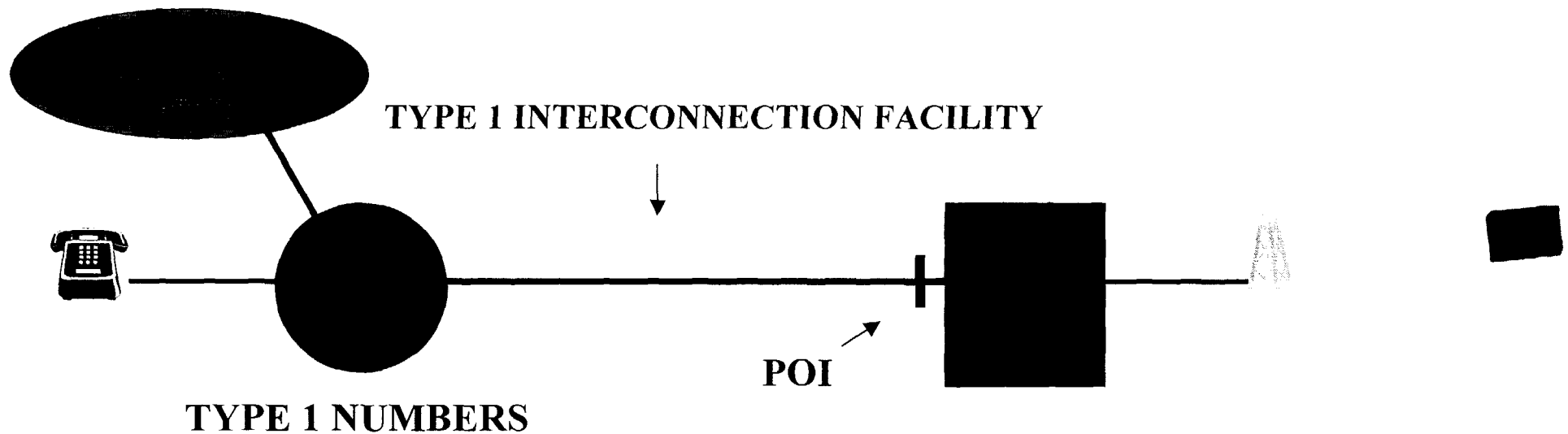
Paging Carriers use the same types of facilities to interconnect with LEC networks as other CMRS providers.

LEC/PAGING INTERCONNECTION



The main difference between LEC/Paging interconnection and LEC interconnection with other Carriers is the traffic flow. Instead of being two-way, most LEC/Paging traffic is one-way. Calls originate on and or transit the LECs' networks and terminate on the Paging Carriers' networks.

TYPE 1 INTERCONNECTION- LOCAL (END OFFICE CONNECTION)



LEC SUBSCRIBER CALLING PAGING SUBSCRIBER



TYPE 2A INTERCONNECTION (TANDEM CONNECTION)

